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Return Date: April 7, 2006
Time: 10:00 a.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

DELPHI CORPORATION, et al.,

Chapter 11
Case No. 05-44481 (RDD)
(Jointly Administered)

Debtors.

NOTICE OF MOTION OF H.E. SERVICES COMPANY, and ROBERT BACKIE, Majority Shareholder FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362 OF THE BANKRUPTCY CODE

TO: See attached list.

H.E. Services Company and Robert Backie, Majority Shareholder, has filed a Motion for Relief from Automatic Stay Under Section 362 of the Bankruptcy Code which seeks a modification or termination of the stay to permit Movants to pursue an action as defined in the motion to Judgment and Collection.

HEARING ON THE MOTION WILL BE HELD ON

April 7, 2006 at 10 a.m.

You are required to file a response to the attached Motion on or before

March 31, 2006.

At the same time, you must also serve a copy of the response upon the undersigned counsel:

Victor J. Mastromarco, Jr.
1024 N. Michigan
P.O. Box 3197
Saginaw, MI 48605

The hearing date specified above may be a preliminary hearing or may be consolidated with the final hearing as determined by the Court.

The attorneys for the parties shall confer with respect to the issues raised by the Motion in advance for the purpose of determining whether a consent Judgment may be entered and/or for the purpose of stipulating to relevant facts such as value of property, and the extent and validity of any security instrument.

Dated: March 6, 2006

Respectfully submitted,

MASTROMARCO & JAHN, P.C.

s/ Victor J. Mastromarco, Jr.

Victor J. Mastromarco, Jr. (P34564)
Attorney for Movant